



MEMO ENDORSED

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May 25, 2023

VIA ECF

Honorable Kenneth M. Karas, U.S.D. J.
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building and
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

**Re: Kelley Ann Baisley v. Slade Industries, Inc., Schindler Elevator Corporation
Civil Action No. 22-cv-3791(KMK)**

Dear Judge Karas:

We represent defendants, Slade Industries, Inc. and Schindler Elevator Corporation (collectively, "Defendants")¹, in the above referenced matter. We write, jointly with plaintiff's counsel, in response to Your Honor's May 23, 2023 Memo Endorsement directing the parties to submit a revised expert discovery schedule (Document No. 23).

The parties have conferred and respectfully request the following deadlines be entered for the completion of expert discovery:

- Plaintiff's expert disclosures and reports to be served by July 28, 2023;
- Defendants' expert disclosures and reports to be served by September 1, 2023; and
- Expert depositions to be completed by September 30, 2023.

¹ Schindler Elevator Corporation has been dismissed from this matter. For simplicity, we continue to refer to Defendants in the plural.

Roseland

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Cherry Hill

Philadelphia

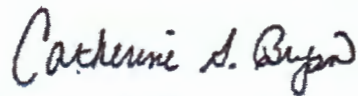
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May 25, 2023
Page 2

Additionally, plaintiff's counsel will confer with the undersigned to select a new date for the proposed site inspection of the subject elevator, and will then re-submit a new subpoena to the Court to be So Ordered prior to service on the County of Westchester.

We thank Your Honor for your time and consideration.

Respectfully submitted,



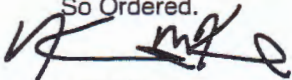
Catherine G. Bryan

CGB/JMV/lmv

cc: Francis X. Young, Esq. (via ECF)
William A. Cerbone, Esq. (via e-mail and regular mail)

The revised expert discovery and site visit schedule is approved.
There will be no more extensions of these deadlines. The Court
will hold a case management conference on 10/12/23, at 10:30
The Movant's pre-motion letter will be due 9/23/23. The non-
Movant's response will be due 9/30/23.

So Ordered.


5/25/23